

I have been a sign language interpreter since 1985. I have seen the dramatic changes technology and the ADA have made in Deaf citizens lives, allowing them to participate more fully in our society, gain education, jobs and be able to communicate with family, friends, work sites, hospitals...really every communication situation we hearing people do without a second thought.

Video Relay has been the biggest equalizer for the Deaf community in the last 5 years. With quality interpreters, Deaf people are able to communicate via a phone system almost as easily as hearing people. The Deaf community has overwhelmingly jumped on this technology and love it! Even people who would not traditionally accept technology, such as elderly, physically challenged (eg: a person with Cerebral Palsy or a broken arm) or mentally disabled, are utilizing this equipment. They discover they are able to communicate, as long as the interpreter is skilled enough to facilitate their communication style, and you can trust that each caller has a unique communication need.

The ADA requires that we provide "functional equivalency". At the current time, we are striving with every call to provide that level of communication. This requires highly skilled interpreters, the more years of experience, the better. It requires ongoing training, that interpreters are able to support each other, occasionally, a caller may require a team of interpreters to make sure the message is clear. There are other interpreters out there, a few with my skill set and years of experience, most with less, many newer interpreters coming into the field with entry level skills and minimum experience. We need the newer people, we need to work with them, develop their skills, train them to be able to step up to the standards of excellence you and the Deaf and hearing callers expect. Those goals are imperative to continue the service, and they take time, energy and resources of people and finances. You also require us to answer the calls in a timely manner, which means we need to have interpreters available to be open and ready to answer calls, though the provider is not being reimbursed for those waiting minutes..

The proposed rate change doesn't make sense to me. You have listed the previous audited numbers, then set the reimbursement for large providers drastically lower than the proven minimum! There is no way a company could absorb that loss and still provide the quality of service, meeting your requirements and strive to even get close to the goal of functional equivalency.

I also wonder about the time line. If the fee was set for a longer period instead of an interim time frame, the providers can set goals to provide service, improve functional equivalency, keep current with technology and trends, provide training and outreach to the Deaf community, especially for new users and the new E911 system. We need to continue to research and develop plans for when emergency systems need to call consumers to alert them of imminent danger. If a disaster was predicted or occurring, can the emergency system access VRS and get the message to all Deaf consumers? These are the few ongoing issues I am aware of, I'm sure there are many more. These are just current equivalency needs, there is also the need to develop new equipment as Internet

capabilities change. An interim fee at approximately 60% of the current costs will not allow provision of service and clearly not allow for planning.

The proposed fee scale, especially for the large providers will force them out of the service. This will provide a large gap in the system, which no other company is prepared to handle in a quick manner. As the market adjusts to the new providers, equivalency will be non-existent. Deaf and hearing users will be forced to wait long periods for an interpreter. This is a strong concern for any emergency calls. I am a strong proponent of open competition, but the medium size companies won't want to take the larger market share, as they will be punished for that growth and forced to accept a fee that won't cover their expenses any more than it will cover the current large providers.

Over the past five years, I have had the opportunity to work with three separate companies, small, medium and large. All three companies have had excellent interpreters and are strongly committed to functional equivalency and customer service. All three companies are very ethical and any concerns about misuse was promptly addressed. I do not imagine any of the companies will be able to survive as a tier 3 provider.

And in the end, if the large provider I work with, is forced to close and I do believe with the current fee scale that is a certainty, I will be out of work. It also means the relay community will lose a highly skilled, very experienced interpreter when their need is so high. Also many quality interpreters and newer interpreters will be out of work and will be required to work in another field. The long term loss of this skill set may not be immediate, but it will come and it will be devastating to not just the Deaf community, but to everyone in our American society who need to be able to communicate with a Deaf, Hard of Hearing or Speech Impaired person in any aspect of life, via videophone or face to face situations.